


U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

# Memorandum

Subject: Petition for Import Eligibility Decision on  
Nonconforming 2000, 2001 & 2002 Jaguar S-Type,  
Passenger Cars.

Date: September 18, 2003

From:   
Coleman Sachs  
Office of Vehicle Safety Compliance

To: Docket Management

Please place the attached petition for a decision that Nonconforming 2000,  
2001 & 2002 Jaguar S-Type, Passenger Cars are eligible for importation in  
Docket No. NHTSA-2003-16206. - 1

Attachment

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Petition for Import Eligibility Determination

IAW 49 CFR 593.5 (A) (1)

June 23, 2003

Administrator  
O.V.S.C.  
National Highway Traffic Safety Administration  
Room 6111  
400 7<sup>th</sup> Street, SW  
Washington DC, 20590  
Attn: NEF-32 Import Eligibility

Dear Mr. George Entwistle,

The following is the basis for this petition:

Part 593.6-(a) (1)

The vehicle for which a determination is sought are the 2000 – 2002 Jaguar S type. We have examined the recall campaigns and we have found that there were no listings for these vehicles. All vehicle reports will have a recall campaign search included with them at the time of submission and any subsequent recalls will be corrected at the time of conversion.

Part 593.6-(a) (2)

The vehicles, which are substantially similar to the petition vehicles, are the US versions.

Part 593.6-(a) (3)

The vehicles, which we believe to be substantially similar, are manufactured for sale in the USA and were certified to meet all applicable Federal Motor Vehicle Safety Standards ("FMVSS") in effect at the time of manufacture. The non-conforming models were not listed on the accepted DOT list in 55 CFR 219, pp219, 47418ff, or the updates that have been published. The differences between the USA models and the non-certified models are very minor and have been outlined in this petition.

**Part 593.6-(a) (4)**

Since US companion models exist, we seek your determination that our petition vehicles are substantially similar to the US models and therefore are eligible for importation and modification in the "substantially similar" category. We have examined the printed text from the dealers both in the USA and in Europe and we have compared the parts list from Europe and the USA. We have determined both what differences exist and what parts will be necessary to bring our non-conforming model into compliance with all applicable FMVSS in effect at the time of manufacture.

These differences and the changes that are necessary, have been outlined in the following examination of each applicable FMVSS.

**Part 593.6-(a) (5)**

The following outline will show that our non-conforming vehicles were originally manufactured to the FMVSS in many areas in the same manner as its U.S. companion models, many of the concerned parts have the same parts numbers as the US models. In all areas that have to be modified the parts will be supplied by the OEM manufacturer. The modifications to these vehicles do not concern the basic structure; only easily removable and available parts.

**FMVSS 101**

The instrument cluster must be changed to the US part.

**FMVSS 102**

The markings, starter interlock, shifting pattern, and brake effect are identical to those in the U.S. models.

**FMVSS 103**

The windshield defogging and defrosting systems are identical to those in the U.S. models.

**FMVSS 104**

The windshield wiping and washing systems are identical to those in the U.S. models.

**FMVSS 105 – FMVSS 135**

The hydraulic brake system and the parking brake system are identical to those in the U.S. models.

**FMVSS 106**

The brake hoses are identical to those in the U.S. models.

**FMVSS 108**

The following modifications must be made to fully meet this FMVSS:

- a. Install U.S. model headlamps and front sidemarker lamps.
- b. Install U.S. model taillamp assemblies and rear side marker lamps.

**FMVSS 109**

These vehicles come equipped with tires that bare the "DOT" symbol.

**FMVSS 110**

The tired placard must be installed to meet this FMVSS requirement.

**FMVSS 111**

The driver's inside and outside rearview mirrors meet this FMVSS. However, the passenger's rearview outside mirror must be changed to the U.S. companion model part or etched to show the appropriate saying to meet the requirements.

**FMVSS 113**

The hood latch system is identical to the one used on the U.S. models.

**FMVSS 114**

These vehicles must be programmed to activate the key warning and belt warning systems.

**CFR 541**

N. A. – Not on high line list.

**CFR 565**

A "Vehicle Identification Plate" must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report.

**FMVSS 116**

These vehicles come equipped with the proper DOT brake fluid and the top of the master cylinder is labeled with the proper DOT information.

**FMVSS 118**

These vehicles meet this FMVSS.

**FMVSS 124**

The accelerator control system is identical to the U.S. models.

**FMVSS 201**

The components subject to this FMVSS are identical to those in the U.S. models.

**FMVSS 202**

These vehicles came equipped with head restraints that are identical to those on the U.S. models.

**FMVSS 203**

N/A when FMVSS 208 is met. Conforms to S5.1 of FMVSS 208. Impact for steering control systems.

**FMVSS 204**

The steering shaft on this vehicle is energy absorbing and is identical to that used on the U.S. models.

**FMVSS 205**

The glass and glazing materials used on this vehicle are identical to those used on the U.S. models. They are clearly labeled with DOT AS-1 or DOT AS-2.

**FMVSS 206**

The door locks and retention components are identical to the USA models.

**FMVSS 207**

The seating system in this vehicle is identical to that used in the U.S. models.

**FMVSS 208**

This vehicle is equipped with a seat belt warning lamp that is identical to that used on the U.S. model. However, these systems must be reprogrammed to activate in the proper manner. (see FMVSS 101) The passive restraint systems used in these vehicles consist of dual front airbags. They also have combination lap and shoulder belts at the outboard front seating positions as well as the rear outboard seating positions. These manual systems are automatic, self-tensioning and are released by means of a single red push-button. All parts of these systems meet this FMVSS and are identical to the US models.

**FMVSS 209**

The seatbelt labels are identical to those on the U.S. models and they meet this FMVSS requirement.

**FMVSS 210**

The seatbelt anchorage's are identical to those of the U.S. models.

**FMVSS 212**

The windshield intrusion zone and the parts and engineering thereof are identical to those of the U.S. models.

**FMVSS 213**

NA -- (Built in child restraint systems) see FMVSS 225.

**FMVSS 214**

Doorbars in this vehicle are identical to those in the USA models.

**49 CFR 581 or FMVSS 215**

The bumpers and support structure for the bumpers on these vehicles are identical to the US models.

**FMVSS 216**

The bodies of these vehicles are identical to that of the U.S. models.

**FMVSS 219**

The windshield intrusion and the parts or components thereof, are identical to those of the U.S. models.

**FMVSS 225**

All parts of these child restraint systems are identical to the U.S. systems.

**FMVSS 301**

The fuel systems in these vehicles are identical to that of the U.S. models. Fuel spillage problems are controlled by the evaporative system that was installed by the factory for the EPA requirements. These evaporative systems have a rollover and check valve incorporated in their design.

**FMVSS 302**

This vehicle is equipped with interior materials that are identical to those used on the U.S. models.

**FMVSS 401**

This vehicle has a secondary trunk release as per this FMVSS.

Thank you for your attention,

J.K. Technologies, L.L.C.

By: Jonathan Weishcit, President